

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

IN RE:)	Case No.: 18-10099
)	Chapter 7
BARRY G. DOSSENKO)	
xxx-xx-5365)	RESPONSE TO MOTION FOR RELIEF
SERENA HEART DOSSENKO)	FROM STAY
xxx-xx-6117)	
Debtors)	

NOW COME the debtors, Barry G. Dossenko and Serena Heart Dossenko, responding to the Motion for Relief from Stay filed by Ditech Financial LLC f/k/a Green Tree Servicing LLC ("Creditor"), and say to the Court:

1. The allegations contained in Paragraph 1 of the Motion are admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Not denied.
7. Denied.
8. Denied.
9. Denied.
10. Admitted.
11. Denied.
12. Denied.
13. Denied.
14. Denied.

FIRST FURTHER DEFENSE

15. The subject property has in excess of \$65,000.00 of equity and the Creditor is adequately protected.

WHEREFORE, the Debtors respectfully request the Court:

1. That the Movant have and take nothing by its action.
2. For a preliminary hearing.
3. For the costs of this action.
4. For such other and further relief as the Court may seem just and proper.

Respectfully submitted, this the 1st day of April, 2019.

PITTS, HAY, & HUGENSCHMIDT, P.A.

By: /s/ Benson T. Pitts

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Asheville, NC 28801
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CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the foregoing document on the parties listed below by depositing same with the United States Postal Service in a properly addressed envelope with adequate postage thereon or by electronic notice*:

*David G. Gray
Chapter 13 Trustee
81 Central Avenue
Asheville, NC 28801

*Joseph J. Vonnegut
Attorney for Ditech Financial
P.O. Box 2505
4317 Ramsey Street
Fayetteville, NC 28302

This the 1st day of April, 2019.

PITTS, HAY & HUGENSCHMIDT, P.A.

By: /s/ Benson T. Pitts
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